



February 10, 2009
VIA ECFS

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Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
2008 CPNI Certification Filing for Protocall LLC

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Protocall LLC hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas
Consultant to Protocall LLC

ST/im.
Enclosure

cc: Best Copy and Printing FCC@BCPIWEB.COM
FCC Enforcement Bureau (provided via ECFS website)
David Lindgren, Protocall
File: Protocall - FCC CPNI
TMS: FCCX0901

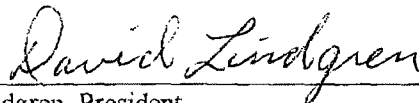
ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(c) CPNI Certification for Calendar Year: 2008
Name of company covered by this certification: Protocall LLC
Form 499 Filer ID: 826498
Name of signatory: David Lindgren
Title of signatory: President

I, David Lindgren, certify and state that:

1. I am the President of Protocall LLC ("Protocall") and, acting as an agent of the company, I have personal knowledge of Protocall's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Protocall's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



David Lindgren, President

2-3-09

Date

Exhibit A
Statement of CPNI Procedures and Compliance

Protocall, LLC
Statement of CPNI Procedures and Compliance

Protocall, LLC ("Protocall" or "the Company") operates solely as a payphone provider and an inmate service provider and as such provides only "coin in the box" pay telephone service and operator assisted call completion services for transient end users. Therefore, Protocall's services consist of casual traffic provided outside of any subscribed service relationship. The Company does not have any information that relates to the quantity, technical configuration, type, or location of the end use customer's service. Because the service is provided outside of any presubscribed service relationship, the Company does not obtain any CPNI that can be used for marketing purposes. Calls other than coin in the box are either billed by the local exchange carrier service the customer or provided on a prepaid basis.

Should the Company expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

The Company has processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. It does not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the call and we can verify it against our records. The called party's local phone company bills collect calls and has its own controls for disclosure and access to this information.

For called parties who establish a prepaid account, at the request of law enforcement personnel, the Company attempts to obtain customer name, address, and phone number to be called. The Company does not validate this information in any way.

All contracts with correctional facilities specify that call detail is the sole property of the correctional facility and that the Company must only disclose or allow access to this data by a) authorized correctional facility personnel, b) the paying party for billing purposes, or c) technical support personnel for the purpose of technical and billing support purposes only. Correctional Facility Personnel and Company personnel must have a valid user ID and password in order to access this data at any time. This access authorization is handled on-site by the highest level facility personnel. The administrator at each location will also establish and manage the process for any lost password replacement.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should the Company ever be required provide call records itself, it would do so only subject to subpoena, and records kept in accordance with the applicable rules.

The Company does not have any retail locations and therefore do not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of the call detail records. There have been no such breaches during 2008, but the Company has a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

The Company did not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.